



September 28, 2018

VIA ECF E-FILING

The Honorable Jean K. FitzSimon
United States Bankruptcy Court
900 Market Street, Suite 203
Philadelphia, PA 19107

**RE: In re Jonathan P. Barger
Bankruptcy No: 18-14725-jkf (United States Bankruptcy Court for the Eastern District of Pennsylvania)**

Dear Judge FitzSimon:

In response to Mr. Kane's September 27, 2018 letter and purported certificate of insurance ("COI") court submission, the movant/secured creditor Syndcore Holdings LLC ("Movant") believes it is necessary to point out several issues with the purported COI: 1) the COI misspells Movant's name and therefore Movant continues to be unsecured by the purported COI, 2) the COI fails to provide coverage for hazardous materials in accordance with Your Honor's instruction during the 9:30 a.m. hearing on September 26, 2018, directing Movant to provide proof of insurance including verification that the insurance covers hazardous materials on the subject property, and 3) the purported COI's effective date is 9/26/18 which indicates that Mr. Kane and/or the debtor misrepresented prior insurance coverage to the Court.

For the foregoing reasons, Movant respectfully requests that the Court grant relief as specified in the previously submitted proposed order. Please feel free to contact me if you have any questions or need anything further from me at this time. Thank you.

Respectfully,

Jason Rabinovich, Esq.